

TOGUT, SEGAL & SEGAL LLP  
Bankruptcy Conflicts Counsel for Delphi Corporation, et al.,  
Debtors and Debtors-in-Possession,  
One Penn Plaza, Suite 3335  
New York, New York 10119  
(212) 594-5000  
Neil Berger (NB-3599)

**Presentment Date: 8/16/2007  
at 12:00 P.M.**

Delphi Legal Information Hotline:  
Toll Free: (800) 718-5305  
International: (248) 813-2698

Delphi Legal Information Website:  
<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DELPHI CORPORATION, et al.,	:	Case No. 05-44481 [RDD]
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X	:	

**NOTICE OF PRESENTMENT OF JOINT STIPULATION AND AGREED ORDER  
COMPROMISING AND ALLOWING CLAIM IN FAVOR OF  
KEN-MAC METALS, A DIVISION OF THYSSENKRUPP METALS, N.A.**

**PLEASE TAKE NOTICE** that Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), by their bankruptcy conflicts counsel, Togut, Segal & Segal LLP, seeks entry of the Proposed Joint Stipulation and Agreed Order Compromising and Allowing Claim (Ken-Mac Metals, a division of Thyssenkrupp Metals, N.A.) (the "Stipulation"), a true and complete copy of which is annexed hereto, will be presented to the Honorable Robert D. Drain, United States Bankruptcy Judge, United States Bankruptcy Court, Room 610, One Bowling Green, New York, New York 10004, on August 16, 2007 at 12:00 Noon (the "Presentment Date").

**PLEASE TAKE FURTHER NOTICE** that objections, if any, must be set forth in writing, describe the basis therefore and be filed with the Court electronically in accordance with General Order M-242 (General Order M-242 and the User's Manual for the Electronic Case Filing System can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's electronic case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to the Chambers of the Honorable Robert D. Drain, Room 610 at the Bankruptcy Court at the address set forth above) and served in accordance with General Order M-242, with a hard copy delivered to: **(i) Togut, Segal & Segal LLP, Conflicts Counsel for the Debtors, One Penn Plaza, Suite 3335, New York, New York 10119, Attn: Neil Berger, Esq., (ii) Lewis & Kappes, P.C., Counsel for Ken-Mac Metals, a division of ThyssenKrupp Metals, N.A., One American Square, Suite 2500, Indianapolis, Indiana 46282, Attn: James J. Ammeen, Jr., Esq.; and (iii) the Office of the United States Trustee, 33 Whitehall Street, 21<sup>st</sup> Floor, New York, New York 10004, Attn: Alicia Leonard, Esq.; and (iv) Latham & Watkins, LLP., 885 Third Avenue, New York, NY 10022, Attn: Henry P. Baer, Esq. so as to be received no later than August 16, 2007 at 11:00 A.M. (the "Objection Deadline").** Unless objections are received by the Objection Deadline, the order may be signed without further notice.

**PLEASE TAKE FURTHER NOTICE** that if a written objection is timely  
filed, a hearing date and time will be established by the Court.

Dated: New York, New York  
July 27, 2007

DELPHI CORPORATION, *et al.*  
By their attorneys,  
TOGUT, SEGAL & SEGAL LLP  
By:

/s/ Neil Berger  
NEIL BERGER (NB-3599)  
A Member of the Firm  
One Penn Plaza  
New York, New York 10119  
(212) 594-5000